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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**No. 3:16-cr-00051-BR-03**

**Plaintiff,**

**v.**

**DEFENDANT'S MOTION FOR BILL  
OF PARTICULARS**

**JOSEPH O'SHAUGHNESSY,**

*ORAL ARGUMENT REQUESTED*

**Defendant.**

Defendant Joseph O'Shaughnessy, through counsel Amy Baggio, moves the Court for an Order directing the government to provide a Bill of Particulars. This motion is based on Fed. R. Crim. P. 7(f) and the constitutionally guaranteed rights to due process, a fair trial, and to prepare a defense. This motion relies on the authorities and argument set forth in the accompanying Memorandum in Support, filed herewith.

## **CERTIFICATE OF CONFERRAL**

On April 25, 2016, undersigned counsel spoke with AUSA Ethan Knight and provided to him a copy of the draft Memorandum In Support Of Motion For Bill Of Particulars. Mr. Knight communicated the government position on this motion as follows:

At this time, the government objects to defendants' motion. However, as the government continues to prepare for trial it will make every effort to communicate with counsel for defendants on an ongoing basis regarding the specific evidence it intends to offer at trial in relation to each charged offense.

Respectfully submitted on April 27, 2016.

/s/ Amy Baggio

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